

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

CGG 19-026215
LOGS Legal Group LLP
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Mount Laurel, NJ 08054
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ATTORNEYS FOR WILMINGTON SAVINGS FUND
SOCIETY, FSB, AS TRUSTEE OF STANWICH
MORTGAGE LOAN TRUST I

In Re:

TONY C. WILLIAMS,
DEBTOR

Case No.: 21-17869-MBK

Judge: HONORABLE MICHAEL B.
KAPLAN

Chapter: 13

NOTICE OF OBJECTION TO CONFIRMATION

The undersigned, LOGS Legal Group LLP, attorneys for the Secured Creditor, WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE OF STANWICH MORTGAGE LOAN TRUST I, the holder of a Mortgage on Debtor's property located at 10 Evergreen Court, Willingboro, NJ 08046, hereby objects to the Confirmation of the Debtor's proposed Chapter 13 Plan, ECF # 2, on the following grounds:

1) Debtor's proposed Chapter 13 Plan does not provide for the curing of the full amount of the mortgage arrearage accrued at the time of the Bankruptcy filing to Secured Creditor. Debtor's Plan proposes to pay Secured Creditor \$30,036.14 through plan payments. Secured Creditor is owed *estimated* pre-petition arrears of \$38,590.64.

2) Debtor's proposed Chapter 13 Plan does not provide for the Secured Creditor to receive distributions with a value equal to the allowed amount of its claims required by 11 U.S.C.1325(a)(5)(B)(ii).

WHEREFORE, WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE OF STANWICH MORTGAGE LOAN TRUST I respectfully requests that the Confirmation of Debtor's Chapter 13 Plan be denied, and that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of pre-petition arrears through the plan that are due to the Secured Creditor.

LOGS LEGAL GROUP LLP

By: /s/Elizabeth L. Wassall
Elizabeth L. Wassall, Esquire

Dated: 10-20-2021

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CERTIFICATION OF SERVICE

I, Abbie Dial the undersigned

1. ☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Kathleen M. Magoon, Esquire and Elizabeth L. Wassall, Esquire, who represents the Secured Creditor in the above-captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On _____, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Notice of Objection to Confirmation

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: 10/21/2021

/s/ Abbie Dial
Printed Name

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Lee Martin Perlman Lee M. Perlman 1926 Greentree Road Suite 100 Cherry Hill, NJ 08003		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Tony C. Williams 10 Evergreen Court Willingboro, NJ 08046		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.